Index to Volume 4

Author Index

AUSTER, ROLF, *Current Tax Planning Options for Trust and Estate Investments* 114

BAGLEY, RONALD M., *An Analysis of the Effects of the Tax Rate Changes in TRA '86 on Investments* 258

BAKER, PAMELA, *ERISA and Soft Dollars* 140

BAKER, PAMELA, *Nondeductible IRAs and New Break-Even Points* 359

COWGILL, NANCY L., *How the 1986 Tax Reform Act Changed the Taxation of Trusts, Estates, and Children* 388

COWGILL, NANCY L. & CUNNINGHAM, JOHN R., *Using Price Adjustment Clauses to Avoid Gift Taxes* 61

DAUGHTREY, ZOEL W. & ROBERTSON, PAUL J., *Taxation of Index Options: New Kid on the Options Block* 130

GOLDMAN, SHELDON M., *The Passive Activity Rules: A New "PAR" for the Course* 203

GOSULE, ALAN L., *IRS Changes Position on the Application of the Tax Benefit Rule* 80

HARVEY, JR., J. RICHARD, *How the New Original Issue Discount Regulations Will Affect Investment Transactions* 3

HASPEL, AHRON H. & BUSH, JOHN N., *Partnerships Special Allocations After the Final Regulations Under Section 704(b)* .. 165

HINEMAN, THOMAS G., *Effect of New Passive Loss Limitations on Oil and Gas Activities* 149

HINEMAN, THOMAS G., *How At-Risk Rules Apply to Partners' Future Contribution Obligations* 92

HORWOOD, RICHARD M., *The Effect of Tax Reform on Investment Strategies* 107

HORWOOD, RICHARD M., *Treatment of Art Under New Tax Law* 187

HUMPHREYS, IVAN H., *Existing Partnerships and the Section 704(b) Regulations* 54

HUMPHREYS, IVAN H., *The Search for Passive Income* 289

Index to Volume 4

Author Index

AUSTER, ROLF, *Current Tax Planning Options for Trust and Estate Investments* 114

BAGLEY, RONALD M., *An Analysis of the Effects of the Tax Rate Changes in TRA '86 on Investments* 258

BAKER, PAMELA, *ERISA and Soft Dollars* 140

BAKER, PAMELA, *Nondeductible IRAs and New Break-Even Points* 359

COWGILL, NANCY L., *How the 1986 Tax Reform Act Changed the Taxation of Trusts, Estates, and Children* 388

COWGILL, NANCY L. & CUNNINGHAM, JOHN R., *Using Price Adjustment Clauses to Avoid Gift Taxes* 61

DAUGHTREY, ZOEL W. & ROBERTSON, PAUL J., *Taxation of Index Options: New Kid on the Options Block* 130

GOLDMAN, SHELDON M., *The Passive Activity Rules: A New "PAR" for the Course* 203

GOSULE, ALAN L., *IRS Changes Position on the Application of the Tax Benefit Rule* 80

HARVEY, JR., J. RICHARD, *How the New Original Issue Discount Regulations Will Affect Investment Transactions* 3

HASPEL, AHRON H. & BUSH, JOHN N., *Partnerships Special Allocations After the Final Regulations Under Section 704(b)* .. 165

HINEMAN, THOMAS G., *Effect of New Passive Loss Limitations on Oil and Gas Activities* 149

HINEMAN, THOMAS G., *How At-Risk Rules Apply to Partners' Future Contribution Obligations* 92

HORWOOD, RICHARD M., *The Effect of Tax Reform on Investment Strategies* 107

HORWOOD, RICHARD M., *Treatment of Art Under New Tax Law* 187

HUMPHREYS, IVAN H., *Existing Partnerships and the Section 704(b) Regulations* 54

HUMPHREYS, IVAN H., *The Search for Passive Income* 289

KATZ, STEVEN JAY, *Material Participation Rule Key to Deducting Passive Losses* 347

KNIGHT, LEE G. & KNIGHT, RAY A., *Obtaining Deductions for Contributions of Qualified Conservation Property* 336

MANKOFF, RONALD M., *Recent Decision* (Hagler) *Requires Haggling to Support R&D Deductions* 184

MANWELL, EDMUND R., *The Competitive True Lease After 1986* 378

MANWELL, EDMUND R., *Sales and Use Taxes in Multistate Mobile Equipment Leasing Transactions* 175

NATBONY, WILLIAM, *Tax Shelters and Section 174: Research and Experimental Expenditures in the Tax Shelter Context* 19

ROBERTS, WINIFRED WARD & BOGIN, ROBERT I., *Parity of Profit and Loss Allocations During a Limited Partnership's Subscription Period* 39

RUDNICK, ROBERT A. & McKENNA, THOMAS A., *The Empire Strikes Back: Update on the Pre-1981 Commodity Straddles* .. 98

RUDNICK, ROBERT A. & PARISE, JOSEPH R., *Real Estate Mortgage Investment Conduits: An Introduction* 238

SANDERS, MICHAEL I., *New Tax Law Creates Many Problems But Few Solutions* 190

SANDERS, MICHAEL I. & COBB, SUSAN A., *TRA '86 Introduces New Equity Financing Source for Real Estate Syndications—The Exempt Holding Company* 354

SCHMUDDE, DAVID, *How the Passive Loss Limitations Affect Real Estate* 280

SCHMUDDE, DAVID, *Tax Consequences of Net Lease Transactions* 87

STARCHER, MARK L., *The 100th Congress: Another Round of Substantive Tax Reform?* 286

STARCHER, MARK L., *What's Next—The Aftermath of Tax Reform* 172

WILLENS, ROBERT, *Mutual Funds Unleashed* 371

WILLENS, ROBERT, *OID Regulations Alter the Financial Landscape* 155

WILLENS, ROBERT, *Rupert Murdoch's Billion-Dollar Gamble* ... 73

WILLENS, ROBERT, *Tax Reform Act Restricts Dividend Arbitrage, but New Developments Offer Hope* 275

WILLINGHAM, CLARK S., *Tax Reform—Agricultural Shelters Are Riding Into the Sunset* 162

WOLFE, JR., HAROLD E., *The "Profits Position" General Partnership: A New Look at Residential Land Syndications* 299

Subject Index

Accounting

Partnerships Special Allocations After the Final Regulations Under Section 704(b), *Ahron H. Haspel and John N. Bush* ... 165

Agricultural Investments

Tax Reform—Agricultural Shelters Are Riding Into the Sunset, *Clark S. Willingham* 162

Art and Collectibles

Treatment of Art Under New Tax Law, *Richard M. Horwood* 187

Commodities

The Empire Strikes Back: Update on the Pre-1981 Commodity Straddles, *Robert A. Rudnick and Thomas A. McKenna* 98

Corporate Finance Vehicles

Mutual Funds Unleashed, *Robert Willens* 371

OID Regulations Alter the Financial Landscape, *Robert Willens* 155

Rupert Murdoch's Billion-Dollar Gamble, *Robert Willens* 73

Tax Reform Act Restricts Dividend Arbitrage, but New Developments Offer Hope, *Robert Willens* 276

Equipment Leasing

The Competitive True Lease After 1986, *Edmund R. Manwell* 378

Sales and Use Taxes in Multistate Mobile Equipment Leasing Transactions, *Edmund R. Manwell* 175

Estate Planning

How TRA '86 Changed the Taxation of Trusts, Estates, and Children, *Nancy L. Cowgill* 388

Using Price Adjustment Clauses to Avoid Gift Taxes, *Nancy L. Cowgill and John R. Cunningham* 61

Index Options

Taxation of Index Options: New Kid on the Options Block, *Zoel W. Daughtrey and Paul J. Robertson* 130

Individual Tax Planning

An Analysis of the Effects of the Tax Rate Changes in the 1986 Act, *Ronald M. Bagley* 258

The Effect of Tax Reform on Investment Strategies, *Richard M. Horwood* 107

Oil and Gas

Effect of New Passive Loss Limitations on Oil and Gas Activities, *Thomas G. Hineman* 149

How At-Risk Rules Apply to Partners' Future Contribution Obligations, *Thomas G. Hineman* 92

Original Issue Discount

How the New Original Issue Discount Regulations Will Affect Investment Transactions, *Richard J. Harvey, Jr.* 3

Partnership

Parity of Profit and Loss Allocations During a Limited Partnership's Subscription Period, *Winifred Ward Roberts and Robert I. Bogin* 39

Passive Activity Rules

The Passive Activity Rules: A New "PAR" for the Course, *Sheldon M. Goldman* 203

Passive Losses

Material Participation Rule Can Be Key to Deducting Passive Losses, *Steven Jay Katz* 347

Pension Fund Investing

ERISA and Soft Dollars, *Pamela Baker* 140

Nondeductible IRAs and New Break-Even Points, *Pamela Baker* 359

Real Estate

How the Passive Loss Limitations Affect Real Estate, *David Schmudde* 280

Obtaining Deductions for Contributions of Qualified Conservation Property, *Lee G. Knight and Ray A. Knight* 336

Real Estate Mortgage Investment Conduits: An Introduction, *Robert A. Rudnick and Joseph R. Parise* 238

Tax Consequences of Net Lease Transactions, *David Schmudde* 87

Research and Development

Recent Decision (*Hagler*) Requires Haggling to Support R&D Deductions, *Ronald M. Mankoff* 184

R&D Partnerships

IRS Changes Position on the Application of the Tax Benefit Rule, *Alan L. Gosule* 80

Tax Shelters and Section 174: Research and Experimental Expenditures in the Tax Shelter Context, *William Natbony* 19

Syndications

New Tax Law Creates Many Problems But Few Solutions, *Michael I. Sanders* 190

The "Profits Position" General Partnership: A New Look at Residential Land Syndications, *Harold E. Wolfe, Jr.* 299

TRA '86 Introduces New Equity Financing Source for Real Estate Syndications—The Exempt Holding Company, *Michael I. Sanders & Susan A. Cobb* 354

Tax Shelters

Existing Partnerships and the Section 704(b) Regulations, *Ivan H. Humphreys* 54

The Search for Passive Income, *Ivan H. Humphreys* 289

Trusts and Estates

Current Tax Planning Options for the Trust and Estate Investments, *Rolf Auster* 114

Washington View

The 100th Congress: Another Round of Substantive Tax Reform? *Mark L. Starcher* 286

What's Next—The Aftermath of Tax Reform, *Mark L. Starcher* 172